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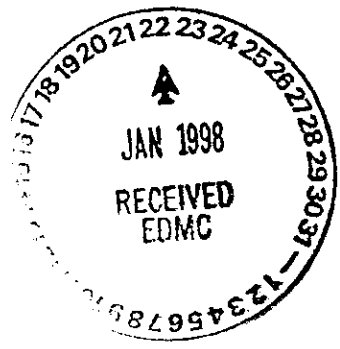
Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

SEP 24 1997



97-EAP-688

Mr. Moses N. Jaraysi
Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Dear Mr. Jaraysi:

CLOSURE CERTIFICATION FOR THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY

Enclosed are the completed Closure Certifications for the 3718-F Alkali Metal Treatment and Storage Facility. These certifications have been signed by an independent, registered professional engineer; Fluor Daniel Hanford, Inc. (FDH) as treatment, storage, and/or disposal (TSD) unit co-operator; and by the U.S. Department of Energy, Richland Operations Office (RL) as facility owner-operator. These signatures certify that the closure of the 3718-F Alkali Metal Treatment and Storage Facility were implemented in accordance with the specifications of the closure plan and the soil sampling and analysis plan. These certifications are required by Washington Administrative Code 173-303-610(6), and were prepared in accordance with Chapter 7 of the 3718-F Closure Plan and Condition V.13.B.f of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit.

Polychlorinated biphenyl (PCB) of a concentration 15 ppm was found in the bottom of the drain sump. A search revealed that there was no use or treatment of PCBs at this TSD unit. As discussed at the August 8, 1997, Project Manager Meeting, information regarding the PCBs in the sump at the 3718-F will be provided to the 300-FF-2 operable unit for their consideration in developing remedial alternatives for the site.

RL requests that the State of Washington Department of Ecology (Ecology) inform the U.S. Environmental Protection Agency Resource Conservation Recovery Information System tracking system that this TSD unit is now "inactive." The Part A Permit Application, Form 3, will be reissued with "Closed on XX/YY/ZZ" (the date on the Ecology response letter) stamped on it. RL and FDH request that Ecology formally accept these certifications for closure by October 31, 1997.

Should you have any questions, please contact Ellen M. Mattlin, of my staff, on (509) 376-2385.

Sincerely,

James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:EMM

William D. Adair, Director FOR
Environmental Protection
Responsible Party for
Fluor Daniel Hanford, Inc.

Enclosures:
1. FDH/RL Closure Certification
for the 3718-F Alkali Metal
Treatment and Storage Facility
2. Professional Engineer's Certification
for the 3718-F Alkali Metal
Treatment and Storage Facility

cc w/encls:
T. Dillhoff, B&W
R. Jim, YIN
D. Powaukee, NPT
S. Price, FDH
J. Wilkinson, CTUIR

cc w/o encls:
W. Adair, FDH
F. Ruck, FDH

CLOSURE CERTIFICATION
FOR 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY
Hanford Site
U.S. Department of Energy, Richland Operations Office

We the undersigned, hereby certify that all 3718-F Alkali Metal Treatment and Storage Facility closure activities were performed in accordance with the specifications of the approved closure plan, soil sampling and analysis plan, as amended by Part V, Chapter 13, of the Hanford Facility Resource Conservation and Recovery Act Permit.

John D. Wagoner

Owner/Operator
John D. Wagoner, Manager
U.S. Department of Energy
DOE Richland Operations Office

9/23/97
Date

Michael H. Hatch

Co-operator
H. J. Hatch, President and
Chief Executive Officer
Fluor Daniel Hanford, Inc.

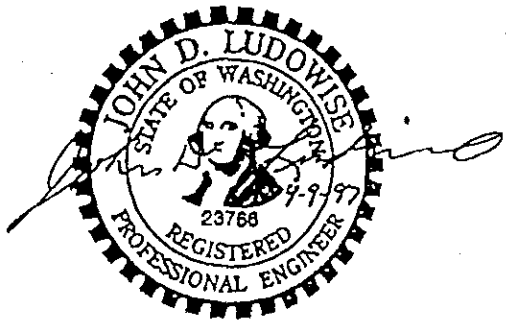
9/18/97
Date

PROFESSIONAL ENGINEER'S CERTIFICATION FOR THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY CLOSURE

I, the undersigned, an independent registered Professional Engineer, hereby certify that I have reviewed the approved Closure Plan, Sampling and Analysis Plan, and supporting closure documentation for the 3718-F Alkali Metal Treatment and Storage Facility, and to the best of my information and belief, closure activities were performed in accordance with the specifications in the approved Closure Plan, except as discussed in the attached Specifications and Limitations of Professional Engineer's Certification. This certification is based solely on my observations of the field sampling activities and my review of pertinent documents.

The above statements are true and complete to the best of my knowledge and within the limits of professional judgment under the prevailing standards of practice on this 9th day of September, 1997.

John D. Ludowise
Washington # 23766
CH2M HILL, Inc.



EXPIRES: 2/9/98

SPECIFICATIONS AND LIMITATIONS OF PROFESSIONAL ENGINEER'S CERTIFICATION FOR THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY CLOSURE

Closure of the 3718-F Alkali Metal Treatment and Storage Facility was initiated during 1995. A closure plan was submitted in November 1995 and approved in January 1996. A certificate of closure for all components of the facility less the surrounding soil was completed during July 1996. This action completed the closure of the facility in accordance with the approved closure plan (Ref. 1). During November 1996, the Department of Ecology (Ecology) added a number of permit conditions that required the collection and analysis of soil samples surrounding the building and concrete pad. During January and February 1997, two meetings were held to scope the nature and extent of soil sampling (Refs. 2 and 3). As a result of these meetings, a soil sampling and analysis plan (SAP) (Ref. 4) was prepared, distributed to Ecology for review and approval (Ref. 5), and the SAP was approved by Ecology.

Field sampling was conducted under the SAP on April 24, 1997 at the location of the 3718-F Facility. Sampling activities were witnessed by John D. Ludowise, P.E.

In general, the sampling activities were performed in accordance with the requirements of the SAP (Ref. 4) and were performed in a manner consistent with commonly accepted practices for collecting and maintaining the integrity of the samples. One minor exception to the sampling plan occurred when the samplers attempted to obtain a sample from the bottom of the drain sump (location 2 as specified in the SAP) from the 15 to 46 cm interval. A metal plate at the bottom of the sump prevented the collection of a sample from the specified location. A decision was made in the field to collect as much soil as possible from the bottom of the drain sump (above the metal plate). This decision is consistent with the intent of the SAP.

The following references were reviewed by the P.E.: The field log, Ref. 6; analytical data packages, Refs. 7 and 8; data validation reports, Refs. 9 and 10. The field log, prepared by the sampling personnel (Ref. 6) is generally reflective of the sampling activities witnessed by the P.E. The analytical methods that were performed (Ref. 7) were as required by the SAP. The validation of the analytical data (Refs. 9 and 10) appear to be reasonable assessments.

The approved SAP listed three constituents (lithium carbonate, potassium carbonate, and sodium carbonate) to be sampled and analyzed for in order to determine if clean closure has been met. Neither the closure plan nor the SAP identified polychlorinated biphenyls (PCBs) as constituents of concern at 3718-F. Ecology had split samples of soil analyzed for metals and PCBs and one of these samples (from the bottom of the drain sump) indicated the presence of Aroclor 1254 (a PCB) at a concentration above Model Toxics Control Act (MTCA) Method B levels. A sample held for analysis at the laboratory contracted by the Department of Energy showed similar results (Ref. 9), although the holding time for the sample had been exceeded (Ref. 10). However, since PCBs were not previously identified as constituents of concern either in the Closure Plan nor the SAP, and since Aroclor could not be traced to any known activity at the 3718-F Facility (Ref. 11), certification of a clean closure at 3718-F in accordance with the closure plan is appropriate. The contamination associated with PCBs should be addressed as part of the remedial process to be conducted under the *Comprehensive Environmental Response, Compensation and Liability Act* (CERCLA).

DOCUMENTS REVIEWED FOR PROFESSIONAL ENGINEER'S CERTIFICATION FOR THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY CLOSURE

1. *The 3718-F Alkali Metal Treatment and Storage Facility Closure Plan,* DOE/RL-91-35, Rev. 2, Dated November 20, 1995.

2. Meeting Minutes: "Project Managers Meeting, 3718-F Alkali Metal Treatment and Storage Facility," January 14, 1997.

3. Meeting Minutes: "Project Managers Meeting, 3718-F Alkali Metal Treatment and Storage Facility," February 3, 1997.

4. *Soil Sampling and Analysis Plan for the 3718-F Alkali Metal Treatment and Storage Facility Closure Activities,* HNF-SD-ENV-AP-004, Rev. 0, June 5, 1997.

5. Meeting Minutes: "Project Managers Meeting, 3718-F Alkali Metal Treatment and Storage Facility," March 13, 1997.

6. *3718-F Alkali Metal TSD,* Pages 22 through 25, Inclusive of Notebook WM-SML-H1, Pages Dated April 29, 1997.

7. Analytical Data Package Prepared for Rust Federal Services by Quanterra Environmental Services, Sample Delivery Group Number W01622, Dated June 12, 1997.

8. Analytical Data Package Prepared for Rust Federal Services by Quanterra Environmental Services, Sample Delivery Group Number W01622A, Dated June 23, 1997.

9. Data Validation Package Prepared for Waste Management Federal Services of Hanford, Inc. By Golder Associates, W01622-QES, Inorganics, Dated July 24, 1997.

10. Data Validation Package Prepared for Waste Management Federal Services of Hanford, Inc. By Golder Associates, W01622-QES, Pesticide/PCB, Dated August 5, 1997.

11. Meeting Minutes: "Project Managers Meeting, 3718-F Alkali Metal Treatment and Storage Facility," August 7, 1997.